REMARKS

We propose to amend claims 1 and 6 to more particularly point our and distinctly claim the invention. Upon entering the amendments presented herein, claims 1-6, 8, and 10-14 will be pending in this application.

The Examiner finally rejected claims 1-6, 8, and 10-14 under 35 U.S.C. §103(a) as being unpatentable over Gal et. al. (WO 01/52106 A2).

The Examiner admits that "Gal fails to expressly disclose sending 'all of' the matching events/invitations in one e-mail to the user." But the Examiner argues that it would have been obvious to one of ordinary skill in the art to add this element to Gal's system. Applicants, however, believe that Gal is missing more than what the Examiner acknowledges. Further, we submit that Gal teaches away from adding the features which the Examiner admits to be missing.

In addition to the feature that the Examiner admits to be missing, Gal also fails to disclose:

> comparing the stored event information about the plurality of events and the stored member information to identify for each member among the plurality of members all events among the plurality of events that match the stored member information for that member

as required by claim 1 as amended. The Examiner appears to believe otherwise in that he argues that in Gal "profile match [is] done by server – by comparing stored profile information." The Examiner appears to be referring to the following passages from Gal:

> The user creates a message and provides profile information of the recipients of the message. For example, if the profile information "photography" is provided, the message is sent to people whose hobby is photography. The message and the profile information is sent to server 26. The server 26 includes spam filtering software 28 which filters the messages. The profile information is used to search the database 30 to obtain a list of recipients. In this example, the message is provided to the recipient computers 32, 34, and 36. The message may be sent via E-mail or by using a dynamically created web page. (page 3, lines 8-15)

> If the spam filter okays the transformation of the message, the profile information is sent to the database checking program 52. This database checking program then produces a list of recipients. The list of recipients is provided, along with the message and user information, to a message broadcast software 54, and the message is then provided to the recipients (page 4, lines 4-8).

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But these passages make clear that Gal's system does <u>not</u> compare "stored event information <u>about</u> <u>the plurality of events</u> and the stored member information" to generate its results. Rather, Gal's system functions as nothing more than a filter between the senders of invitations and the recipients of those invitations. It processes each individual invitation separately upon receipt and determines to whom that individual invitation should be sent.

As we noted above, the Examiner admits that Gal's system does not perform the function of "generating and sending an electronic invitation message to the electronic mailbox of each member..., wherein each electronic invitation message invites its corresponding recipient to <u>all</u> of the events for which matches were detected for that corresponding recipient." But he argues that:

> Gal does disclose event information by user/key number (pg. 5), and Gal also discloses electronically sending invitation information to users (pg.4).

> Therefore, it would have been obvious to one of ordinary skill in the art at the time the invitation was made to have included sending "all of" the matching events/invitations in one e-mail to the use[r] in the system disclosed by Gal, for the advantage of providing a method of invitation delivery with the ability to save system resources for both the user and the sender, by combining information sent.

The parts of Gal's database 90 that store event information and user/key numbers are tables 98 and 100. Table 98 lists invitations along with pointers to the message block describing the event and Table 100 lists user/key numbers identifying the users and for each user/key number, the invitations which apply to that user/key. These two tables are provided as support for the dynamic creation of a web page when the user visits the web site.

In arguing that it would be obvious to use the information that is stored in these two tables to generate emails that consolidate multiple invitations for each user, the Examiner is ignoring why those tables are provided in the first place. More specifically, the Examiner is ignoring that these features are part of an <u>alternative</u> embodiment designed to avoid sending email to users. Gal states:

> An alternative system using a dynamically created web page uses tables such as Tables 98
> and 100. Each invitation message created is associated with a pointer to the message block.
> … Thus, when a user goes to the web page for the user's invitations, a web page is
> dynamically constructed by searching the database 90 for invitation corresponding to the
> user's key number. [emphasis added] (page 5, lines 15-20).

> The advantage of the message with the dynamically created web page rather than a
> traditional E-mail type message is that the messages are not considered as intrusive by the
> recipient since the recipient only needs to see the invitations when they go to the
> dynamically created web page. The messages don't clog up the recipient's work or hone E-
> mail system. [emphasis added] (page 6, lines 2-6).

Since Gal's alternative embodiment is for deployments in which email is to be avoided, why would
a person of ordinary skill in the art then use the information that is collected for that alternative
embodiment to generate emails? We submit that a person of ordinary skill in the art would not
modify Gal's system in the way the Examiner has proposed. Moreover, since Gal has already
provided an embodiment which employs an email notification mechanism (i.e., his first described
embodiment) in which invitations are forwarded to users by email as those invitations arrive at the
site, there is no motivation to modify the alternative embodiment to perform a function it was
designed to avoid performing.

For at least the reasons stated above, we submit that it would not be obvious to modify Gal's
system so that it sends an email that contains multiple invitations, as required by claim 1.

Claim 6, as amended, includes features that are similar to those listed above for amended
claim 1.

For the reasons stated above, we believe that the claims are in condition for allowance and
therefore ask the Examiner to allow them to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-0219, under Order No. 2000874.00146US1 from which the undersigned is authorized to draw.

Respectfully submitted,

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